

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA

v.

PAULETTE MARTIN, et al.

No. 07-4060

No. 07-4059 (L)

* * * * *

JOINT MOTION FOR LEAVE TO FILE A SUPPLEMENTAL JOINT APPENDIX

Come now Appellant herein, Paulette Martin, by and through her counsel, Michael D. Montemarano, Esq., and Michael D. Montemarano, P.A., as appointed counsel pursuant to the CJA, and on behalf of the other Appellants herein, and on behalf of Daniel Goodman, Esq., USDOJ/Criminal Appeals Section, counsel for Appellee, and does move for leave to file a Supplemental Joint Appendix, and in support thereof does state:

1. The Joint Appendix was filed on February 25, 2011, with certain volumes being withdrawn and refiled contemporaneously with this *Motion*.

2. Due to the size of the Joint Appendix, the copying required for submission to the printer, and revisions required by the modification by the Court of the parameters for submitting sealed volumes in a multiple-appellant criminal appeal, numerous pages of the record were cited to by the parties, but were not identified by the parties for inclusion in the JA. The page proof brief filed herein therefore cites to pages of the record not included within the JA. Six of the seven parties were guilty of this under-identification of materials. This necessarily will make the Briefs of the respective parties incomplete and confusing.

3. Lead counsel for Appellants has, after careful consultation with the responsible parties, assembled a Supplemental Joint Appendix which includes these missing pages of the record, which the parties submit will assist the Court in analyzing this appeal. To ensure that the SJA can be used efficiently, certain pages *not* omitted from the JA also have been reproduced in the SJA, so that there is no need to refer between the JA and SJA to comprehend a particular citation to the record.

4. The parties therefore request that leave be granted, and the Supplemental Joint Appendix be accepted for filing.

5. Counsel for Appellant is authorized to state that counsel for Appellee joins the request for the grant of this relief.

Respectfully submitted,

March 8, 2011

/s/

MICHAEL D. MONTEMARANO

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For Appellant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on or before this 8th day of March, 2011, a copy of the foregoing *Joint Motion For Leave to File a Supplemental Joint Appendix* was filed via CM-ECF, and served via direct email, on Daniel Goodman, Esq., US Department of Justice, Criminal Appellate Section, 1264 Main Building, 950 Pennsylvania Avenue, NW, Washington, DC 20530.

/s/

MICHAEL D. MONTEMARANO